

**IN THE DISTRICT COURT OF FOR THE WESTERN DISTRICT OF
OKLAHOMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. CR-10-188-2-R
)	
ALICIA DANIELLE FREERKSEN,)	
)	
Defendant.)	

**UNOPPOSED MOTION TO DISMISS PETITION FOR SUMMORS FOR
OFFENDER UNDER SUPERVISION**

Defendant, Alicia Danielle Freerksen, moves for an order dismissing the Petition for Summons for Offender Under Supervision [*Doc. 167*]. In support of this motion, counsel states the following:

1. On March 4, 2021, a Petition for Summons for Offender Under Supervision was filed by the United States Probation Office. The Petition alleged three violations: using an unmonitored smart phone, circumventing monitoring by destroy or discarding a mobile phone, and communicating with a person she knew to be a felon without out permission of her probation officer.

2. Ms. Freerksen appeared for a revocation hearing on March 23, 2021, pursuant a summons. Ms. Freerksen stipulated to violating the terms of supervised release. The Court found that Ms. Freerksen violated the terms of supervised release as alleged. [*Doc. 175*].

3. Ms. Freerksen and counsel requested that the Court continue the

disposition of the matter to give Ms. Freerksen an opportunity to become fully compliant with the conditions. The Court continued the disposition of the matter for 6 months based on Ms. Freerksen's assurance that she would remain compliant with her conditions.

4. The hearing for disposition of the violation of supervised release is scheduled for September 20, 2021, at 9:00 a.m. Ms. Freerksen's supervising probation officer, Leslie Terrell, advised counsel that Ms. Freerksen is in compliance with the conditions of her supervised release. Therefore, Ms. Terrell is in favor of dismissing the petition seeking revocation of the term of supervised release based on Ms. Freerksen's compliance with the conditions since the filing of the petition. It appears Ms. Freerksen has taken advantage of the opportunity provided by the Court to address the issues that led to the filing of the petition.

5. Mr. Brandon Hale, Assistant United States Attorney, concurs in the recommendation of the Probation Office that the petition should be dismissed.

Therefore, Ms. Freerksen requests this Court enter an order dismissing the Petition for Summons for Offender Under the Supervision [*Doc. 167*] without prejudice and striking the hearing on the Petition scheduled September 20, 2021.

Respectfully submitted,

s/ J.P. HILL

J.P. HILL, OBA #31085
Duncan & Hill Law Firm
1400 N.W. 16th Street
Oklahoma City, Oklahoma 73106
Telephone: (405) 628-7007
jp@duncanandhill.com
ATTORNEY FOR DEFENDANT
ALICIA DANIELLE FREERKSEN

CERTIFICATE OF SERVICE

This is to certify that on this 16th day of September, 2021, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant: Brandon Hale, Assistant United States Attorney.

s/ J.P. Hill

J.P. HILL